

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In RE: Maranda Grasley	:	Chapter 13
Debtor	:	22-02354
Maranda Grasley,	:	Re. Claim No. 5
Objector	:	
v.	:	
Midland Credit Management, Inc.,	:	
Respondent	:	

DEBTOR'S FIRST SET OF INTERROGATORIES PROPOUNDED TO CLAIMANT

Kindly serve answers to the following questions upon Debtor's Attorney, Vicki Piontek, Esquire, 58 East Front Street, Danville, PA 17821. You may send the answers by email, fax or regular mail. Please provide answers within 30 of your receipt.

1. Set forth the name, address and telephone number, title and position of each person furnishing information used to answer these interrogatories, to Plaintiff's to any of requests for production of documents and things or to Plaintiff's requests for admissions.
2. Identify all records or documents of any kind whatsoever, written or electronic, in Claimant's possession or control related to Plaintiff or the account which is the subject matter of this case including but not limited to the following.
 - a. Records of all correspondence, written, mail, email, fax, telephone or in person between Claimant and the alleged original creditor about the account which is the subject matter of this case. Provide a description of the correspondence, the names of the parties, the participants.

b. All internal emails between officers, directors, agents or employees of Claimant about Debtor or the account which is the subject matter of this case. This includes internal emails between officers, directors, agents or employees of Claimant, except to Claimant's attorney(s).

3. Indicate whether Claimant is the owner of the account which is the subject of the proof of claim. If Claimant is not the owner of the account, then please provide the name, address and phone number of the owner of the account.

4. By what means was the purported governing transmitted to the Debtor by the original creditor? Written? Hard copy? Electronic? Or other?

5. Identify what record(s) in Claimant's possession which show(s) the date on which the purported governing contract was sent to Debtor or received by the Debtor.

6. Identify all efforts made by Claimant to contact the original to determine the answer to Interrogatories 4-5. Provide the date of such efforts. Who made the effort(s)? Provide the name, address and telephone number of the representative(s) of the original credit who was / were contacted by Claimant. Provide a detailed account of that occurred during the course of such efforts.

7. State the specific basis of your pleading in the answer to claimant's objection to proof of claim that Debtor paid on the account which is the subject of this proof of claim for "years." Identify every payment made over the course of "years."

8. For every response to Debtor's First Set of Requests for Admission that contains anything other than an unqualified admission.

qualified admission and, if insufficient knowledge is claimed, state all steps taken by you and/or your attorney to obtain the requisite knowledge for a good faith response;

- b. Describe each and every document you contend relates to or supports your denial or qualified admission and, if insufficient knowledge is claimed, identify all material reviewed to obtain the requisite information necessary for a good faith response; and
- c. Identify each and every person with knowledge of facts relating to or supporting your denial or qualified admission and state the specifics of their knowledge and, if insufficient knowledge is claimed, identify all individuals or entities contacted to obtain the requisite documentation or information necessary for a good faith response.

Wherefore, please respond by furnishing the requested information and documents within thirty days of your receipt.

Respectfully Submitted,

Vicki Piontek 10-23-23
Vicki Piontek, Esquire
Attorney for Debtor
58 East Front Street, Danville, PA 17821
vicki.piontek@gmail.com 215-290-6444 Fax: 866-408-6735

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Certificate of Service

I served a true and correct copy of the attached interrogatories to the following parties at the following address by Certified and First Class U.S. Mail postage pre-paid.

Midland Credit Management, Inc.
Attention: Brian C. Nicholas, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106

Also By Email: bnicholas@kmllawgroup.com

Vicki Piontek 10-23-23
Vicki Piontek, Esquire
Attorney for Debtor
58 East Front Street
Danville, PA 17881
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